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commercial+international

Ms J Reid
Director, Operations 2
Anti-Dumping Commission
Customs House
5 Constitution Avenue
Canberra
Australian Capital Territory 2601

By email

Dear Ms Reid

Hyundai Steel Company –hot rolled plate steel from Korea BlueScope submission about cost constructed normal value

A letter from BlueScope Steel Limited ("the Applicant") dated 2 August 2013 has been placed on the public record of this investigation.

The Applicant claims that the normal value determined for Hyundai Steel Company ("Hyundai Steel") should somehow *"reflect a comparable normal value to that assessed"* for Dongkuk Steel Mill.

In response to that claim, Hyundai Steel maintains that there is no reason for the dumping margin outcomes of different exporters to be the same, and that - to the contrary - there are many reasons why they should not be the same.

There can be no doubt that the costs, prices, products and financial performance of one company when compared to another will be different. For instance, Hyundai Steel is an integrated producer of hot rolled plate steel. Other companies purchase inputs that Hyundai Steel makes for itself.

These differences are exacerbated in the case of an anti-dumping investigation such as this one, where the precise product mix, weightings and volumes of products are changeable depending on the specific sales profile of each company, and where their routes to market are different as well.

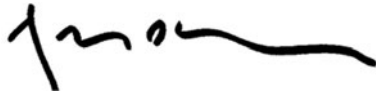
The suggestion in the Applicant's submission that higher costs should be substituted into Hyundai Steel's constructed normal value calculation is a matter of very great concern and regret so far as Hyundai Steel is concerned. Hyundai Steel believes in fair competition, the rule of law, and ethical commercial behaviour. Asking for an artificial and arbitrary cost substitution to be practised against Hyundai Steel, for the sole purpose of generating an adverse dumping margin against Hyundai Steel's exports to Australia, contradicts these principles.

Hyundai Steel's costs were accurately presented and accurately verified by the Australian Customs and Border Protection Service (now the Anti-Dumping Commission). With respect, the Applicant does no favours to its credibility by suggesting that Hyundai Steel should be discriminated against through some unlawful cost substitution methodology, and Hyundai Steel would request that it desist from doing so.

NON-CONFIDENTIAL

Hyundai Steel asks that the investigation against it be terminated as soon as possible, consistent with the Commissioner's duty under Section 269TDA(1) of the *Customs Act 1901*.

Yours sincerely

A handwritten signature in black ink, appearing to be 'DM' followed by a long, wavy horizontal line.

Daniel Moulis
Principal